

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION

This document relates to:

*“Track One Cases”*

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**DECLARATION OF WILLIAM T. DAVISON IN SUPPORT OF  
MALLINCKRODT’S REPLY MEMORANDUM IN SUPPORT OF ITS  
MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, William T. Davison, declare as follows:

1. I am an attorney at the law firm of Ropes & Gray LLP and counsel to Defendants Mallinckrodt LLC, SpecGx LLC, and Mallinckrodt plc<sup>1</sup> (“Mallinckrodt”).

2. I make this declaration on behalf of Mallinckrodt in support of its Reply Memorandum in Support of its Motion for Partial Summary Judgment.

3. Attached as **Exhibit 1** is a true and correct copy of the website printout and corresponding documentation reflecting its capture, marked as Exhibit 20 during the April 23, 2019 deposition of Matthew Perri.

4. Attached as **Exhibit 2** is a true and correct copy of an email correspondence from Plaintiffs’ attorney, Dean Kawamoto, to Mallinckrodt attorney, Jennifer Pantina, seeking a meet and confer to discuss Mallinckrodt’s document production, dated January 3, 2019. Along with this email is a true and correct copy of the excel spreadsheet attached to the January 3, 2019 email, detailing Mallinckrodt’s document production.

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<sup>1</sup> Mallinckrodt plc is an Irish company that is not subject to and contests personal jurisdiction for the reasons explained in its motion to dismiss for lack of personal jurisdiction; it is specially appearing for this motion, and, thus, it does not waive and expressly preserves its personal jurisdiction challenges.

Executed this 16th day of August, 2019.

/s/ William T. Davison

William T. Davison  
ROPES & GRAY LLP  
Prudential Tower  
800 Boylston Street  
Boston, MA 02199-3600  
(617) 951-7135

*Attorney for Defendants Mallinckrodt LLC  
and SpecGx LLC, and appearing specially  
for Mallinckrodt plc*

**CERTIFICATE OF SERVICE**

I, Brien T. O'Connor, hereby certify that the foregoing document was served via file transfer protocol to all counsel of record.

/s/ Brien T. O'Connor  
Brien T. O'Connor